

December 3, 2001

Via Electronic Filing

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Presentation in CC Docket No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, the Competitive Telecommunications Association ("CompTel") hereby gives notice that on November 29, 2001, its representatives met with Commission staff to discuss CompTel's Petition to establish procedures for the Commission's upcoming review of the national list of UNEs. CompTel met with Sam Feder, Legal Advisor to Commissioner Martin.

CompTel reiterated its request that the Commission convene a Joint State-Federal Conference as a more formalized means of securing state participation in the Commission's review proceeding. CompTel also asked that the Commission establish specific procedures and evidentiary standards that would apply to requests to remove UNEs from the nationwide list. Further, CompTel explained that the Commission's triennial review proceeding should not be a *de novo* review of every required UNE, but rather only those UNEs for which an incumbent LEC has satisfied a prima facie showing that the element may not, in all areas, continue to satisfy the "necessary and impair" conditions of the Act. Finally, CompTel asked the Commission to make clear that it would not consider removing any UNE unless the ILEC can prove that it has fully and satisfactorily complied with its existing obligations to provide the UNE, or UNE combination, in a nondiscriminatory manner.

Representing CompTel were Robert Aamoth of Kelley, Drye & Warren, L.L.P, Carol Ann Bischoff, Executive Vice President and General Counsel, CompTel, and the undersigned attorney.

Sincerely,

Jonathan Lee
Vice President,
Regulatory Affairs